

Dated: October 9, 2020

Respectfully submitted,  
/s/ David Campbell  
David Campbell  
Southern District ID No. 1073749  
Texas Bar No. 24057033  
ATTORNEY-IN-CHARGE  
Email: [dcampbell@808west.com](mailto:dcampbell@808west.com)  
Kevin O'Hanlon  
Southern District ID No. 10280  
Texas Bar No. 15235500  
Email: [kohanlon@808west.com](mailto:kohanlon@808west.com)  
Leslie McCollom  
Southern District ID No. 7047  
Texas Bar No. 13431975  
Email: [lmccollom@808west.com](mailto:lmccollom@808west.com)  
**O'HANLON, DEMERATH & CASTILLO**  
808 West Avenue  
Austin, Texas 78701  
Phone: (512) 494-9949  
Fax: (512) 494-9919  
**ATTORNEYS FOR DEFENDANTS**

### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served through the federal court ECF system, and by email, on the following, on October 9, 2020:

Marcus C. Barrera  
Aaron Alaniz  
BARRERA, SANCHEZ & ASSOCIATES, P.C.  
BARRERA, SANCHEZ & ASSOCIATES, P.C.  
[marcus@bsmlawyers.com](mailto:marcus@bsmlawyers.com)  
[melissa@bsmlawyers.com](mailto:melissa@bsmlawyers.com)  
**Counsel for Plaintiff**

/s/ David Campbell  
David Campbell

**EXHIBIT “A”**  
**SUBPOENA DUCES TECUM**

“Documents and tangible things” is defined by Rule 34(a)(1). The term also includes electronically stored information. (See Rule 34(a)(1)(a).

The terms “you” and “your” mean the Plaintiff Ricardo Lopez and his agents, representatives, attorneys, experts, and other persons acting or purporting to act on Plaintiff Ricardo Lopez’s behalf.

Please print out a legible copy of all electronically stored data and information as well as provide a .pdf and native format copy on compact disc of same.

1. All documents and tangible things that show you notified your principal or immediate supervisor about the arrest described in your Complaint within three calendar days of the arrest.
2. All documents and tangible things that show you requested a hearing within 15 days of receiving the Notice of Proposed Non-renewal dated October 19, 2018.
3. All documents and tangible things regarding your non-renewal or termination at any time in 2018 and 2019.
4. All documents and tangible things that show you received medical treatment for mental anguish and emotional stress.
5. All documents and records pertaining to Cause No. 20-CR-57; *State of Texas v. Ricardo Lopez, Jr.*